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VIA ECF

The Honorable Gabriel W. Gorenstein
United States Magistrate Judge
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

***Schansman et al. v. Sberbank of Russia PJSC et al.*, No. 1:19-cv-02985-ALC-GWG (S.D.N.Y.)
– Update Relevant to Plaintiffs’ Motion to Compel the Production of Documents from VTB
Bank PJSC (ECF No. 478)**

Dear Judge Gorenstein:

Pursuant to Your Honor’s Individual Practice 1.A, Plaintiffs write to notify the Court that there has been no progress in VTB Bank PJSC’s (“VTB”) attempts to obtain permission from Russian governmental authorities to produce documents responsive to Plaintiffs’ discovery requests since the parties completed briefing on Plaintiffs’ motion to compel the production of documents from VTB (ECF No. 494).

On Wednesday, February 8, 2023, counsel for Plaintiffs (Jason P. Hipp) contacted counsel for VTB (Robert Landy) to inquire about the status of VTB’s requests to Russian governmental authorities, including their most recent written requests of November 30, 2022 to the Ministry of Finance and December 1, 2022 to the Central Bank of Russia. Counsel for VTB reported that despite follow-up communications from VTB, neither the Ministry of Finance nor the Central Bank of Russia has responded to VTB’s requests. Counsel was unable to provide a timeline for when a decision or even a response from either Russian governmental entity could be expected.

Plaintiffs thought it prudent to update the Court on these matters given that the parties are approximately four months from the June 19, 2023 deadline for the substantial completion of party document production.

Respectfully submitted,

/s/ Terri L. Mascherin

Terri L. Mascherin (admitted *pro hac vice*)
Lee Wolosky
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cc: Counsel of Record (via ECF)